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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 JOSE FLORES-DE LA CRUZ,  
15 Defendant.

Case No. 2:21-cr-00010-APG-DJA

**STIPULATION TO CONTINUE  
WAIVER OF INDICTMENT, FILING  
OF AN INFORMATION,  
ARRAIGNMENT AND PLEA, AND  
SENTENCING HEARING  
(First Request)**

17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.  
18 Trutanich, United States Attorney, and Jared Grimmer, Assistant United States Attorney,  
19 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,  
20 and Heidi Ojeda, Assistant Federal Public Defender, counsel for Jose Flores-De La Cruz, that  
21 the waiver of indictment, filing of an information, arraignment and plea, and sentencing  
22 Hearing currently scheduled on March 3, 2021, be vacated and continued to a date and time  
23 convenient to the Court, but no sooner than forty-five (45) days.

24 This Stipulation is entered into for the following reasons:

25 1. Counsel met with the client on March 2, 2021 to discuss the hearing and the  
26 client would like additional time to consult with his attorney prior to going forward.

1           2.       The defendant is in custody and agrees with the need for the continuance.

2           3.       The parties agree to the continuance.

3           This is the first request for a continuance of the waiver of indictment, filing of an  
4 information, arraignment and plea, and sentencing hearing.

5           DATED this 2<sup>nd</sup> day of March 2021.

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7           RENE L. VALLADARES  
8           Federal Public Defender

              NICHOLAS A. TRUTANICH  
              United States Attorney

9           By/s/ Heidi Ojeda

By /s/ Jared Grimmer

10          HEIDI OJEDA  
11          Assistant Federal Public Defender

              JARED GRIMMER  
              Assistant United States Attorney

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 JOSE FLORES-DE LA CRUZ,

7 Defendant.

Case No. 2:21-cr-00010-APG-DJA

**ORDER**

9  
10 IT IS THEREFORE ORDERED that the waiver of indictment, filing of an information,  
11 arraignment and plea, and sentencing hearing currently scheduled for March 3, 2021  
12 at 2:00 p.m., be vacated and continued to April 21, 2021 at the hour of 3:00 p.m. in LV  
13 Courtroom 6C.

14 DATED this 2nd day of March 2021.

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17 UNITED STATES DISTRICT JUDGE